

**IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF OKLAHOMA**

<b>THE UNITED STATES OF AMERICA,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>CIVIL ACTION NO:</b>
	)	<b>06-CV-673-GKF-FHM</b>
1. <b>THE STATE OF OKLAHOMA;</b>	)	
2. <b>THE HONORABLE BRAD HENRY,</b>	)	
<b>Governor of the State of Oklahoma,</b>	)	
<b>in his official capacity only;</b>	)	
3. <b>THE OKLAHOMA OFFICE OF</b>	)	
<b>JUVENILE AFFAIRS;</b>	)	
4. <b>ROBERT E. CHRISTIAN, Executive Director</b>	)	
<b>of the Oklahoma Office of</b>	)	
<b>Juvenile Affairs, in his official</b>	)	
<b>capacity only;</b>	)	
5. <b>THE OKLAHOMA BOARD OF</b>	)	
<b>JUVENILE AFFAIRS;</b>	)	
6. <b>CHARLES JACKSON, Chairperson of the</b>	)	
<b>Oklahoma Board of</b>	)	
<b>Juvenile Affairs, in his</b>	)	
<b>official capacity only; and</b>	)	
7. <b>EVERETT GOMEZ, Superintendent of</b>	)	
<b>the L.E. Rader Center,</b>	)	
<b>in his official capacity only,</b>	)	
	)	
<b>Defendants.</b>	)	
	)	

**RENEWED JOINT MOTION FOR ENTRY OF CONSENT DECREE**

All parties hereby jointly move this Court to sign the attached Consent Decree and enter it as an order of the Court. Entry of this Consent Decree as an order of the Court will resolve this case as to Defendants State of Oklahoma and the Oklahoma Office of Juvenile Affairs. The parties request that the Court hold this case in abeyance as to the remaining Defendants, pending the parties' compliance with the Consent Decree.

The parties represent to the Court that the Consent Decree satisfies the requirements of 18 U.S.C. § 3626(a)(1)(A). The parties request that the Court issue findings that the Consent Decree satisfies the requirements of 18 U.S.C. § 3626(a)(1)(A).

The parties further request that the Court retain jurisdiction over this case until the substance of the terms of the Consent Decree are fulfilled and the case is dismissed.

Finally, the parties request that the Court retain power to enforce the Consent Decree.

Respectfully submitted,

For the United States:

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United States Attorney  
Northern District of Oklahoma  
Attorney for Plaintiff

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s/ Matthew J. Donnelly

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For the Defendants:

s/ Kindanne C. Jones

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### CERTIFICATE OF SERVICE

I hereby certify that today I caused a copy of the Parties' RENEWED JOINT MOTION FOR ENTRY OF CONSENT DECREE in United States of America v. State of Oklahoma, et al., Civil Action No. 06-CV-673-GKF-FHM, to be served electronically to the following individuals:

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Dated this 8th day of September, 2008.

s/ Matthew J. Donnelly  
MATTHEW J. DONNELLY